

February 7, 2017

Michael P. Murphy, Program Coordinator
State Of Tennessee
Department Of Environment and Conservation
Nashville Environmental Field Office
Division of Water Resources
711 R.S. Gass Blvd
Nashville, Tennessee 37216

Regarding: Notice of Violation NPDES Permit # TN0002259 Davidson County
E.I du Pont de Nemours and Company
Old Hickory Plant

Dear Mr. Murphy,

This is in response to your letter, dated January 24, 2017 concerning foaming in the discharge to Old Hickory Lake on January 13, 2017. You requested a written response with a corrective action plan be sent to your office within 30 days of receipt of Notice of Violation of NPDES permit. This corrective action plan is to include each corrective action or cleanup measure that was taken. Also, the plan is to include investigation results of the foaming incident and details of actions to prevent any future discharge of foam.

DuPont's correction action plan:

A notice has been sent to tenants demanding the following:

- Conditions causing foaming be stopped immediately
- Reminders of responsibilities under NPDES permit
- Immediate response by the tenant includes flow restrictions for any abnormal discharge

Procedure for Monitoring Water Management System:

- Visual observation of system for deficiencies and take preemptive measures including clean up to prevent abnormal discharge.
 - Monitor water system at minimum 6 times daily
 - Observe water system for abnormal discharge
 - Determination of source(s) of abnormal discharge
- Immediate response for abnormal discharge
 - Notify source
 - Request immediate investigation to identify source or cause of foaming
 - Request deficiency or abnormal discharge cease immediately
- Collect samples
- Confirm abnormal condition has ceased
- Clean up
- Notify Agency

